

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CONCORD ENERGY LLC,

Plaintiff,

v.

**HELLERVIK OILFIELD
TECHNOLOGIES LLC,**

Defendant.

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CASE NO: 4:21-cv-00328

**JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE AND REPLY TO
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the Parties, Plaintiff Concord Energy LLC (“Concord”) and Defendant Hellervik Oilfield Technologies LLC (“Hellervik”), move for an extension of time to file their respective response and reply to Hellervik’s Partial Motion for Summary Judgment. As grounds for this request, the Parties state as follows:

1. Hellervik filed its Partial Motion for Summary Judgment on November 19, 2021.
2. Concord’s response is currently due on December 10, 2021. Hellervik’s reply would be due on December 17, 2021.
3. In light of competing commitments in other matters and holiday schedules, the Parties propose that both deadlines be extended, with Concord’s response being due on December 22, 2021, and Hellervik’s reply being due on January 7, 2022.
4. This is the first request by any party for extensions of summary judgment response and reply deadlines.

5. Neither the Court nor any party will be prejudiced by the requested extension.

WHEREFORE, the Parties respectfully request that the Court grant this motion for extension of time to file their respective response and reply to the Partial Motion for Summary Judgment, such that the following deadlines apply:

- Concord's Response to Hellervik's Partial Motion for Summary Judgment is extended until December 22, 2021; and
- Hellervik's Reply to Concord's Response to Hellervik's Partial Motion for Summary Judgment is extended until January 7, 2022.

A proposed order reflecting this extension is attached for the Court's approval.

Dated: December 6, 2021

/s/ Mark Champoux

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2021, a true and correct copy of the above was filed and served via email through the Southern District of Texas's CM/ECF Notice of Electronic Filing System.

/s/ Mark Champoux